

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN

Plaintiff

V

McCONNELL VALDES, LLC;
ANTONIO A. ARIAS-LARCADA, ET AL

Defendants

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CIVIL NO.: 24CV01136

EXHIBIT D

ALAN GOLDMAN'S AFFIDAVIT UNDER
PENALTY OF PERJURY

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Affidavit of Alan Bram Goldman

I, Alan Bram Goldman, being duly sworn, depose and state as follows:

1. **Purpose of Affidavit**

2. I submit this affidavit to provide a detailed account of my severe medical conditions, the significant impact on my mental and physical health, and the resulting limitations on my daily life and ability to travel.

3. **Medical History**

I suffer from numerous debilitating health conditions, including but not limited to:

- **Cancer diagnoses:** Squamous Cell Carcinoma of the Skin, Malignant Neoplasm of the Urinary Bladder Neck, Transitional Cell Carcinoma of the Right Renal Pelvis, Carcinoma of the Bladder, and recurring bladder cancer requiring regular cystoscope exams 3 times per year at MGH and surgical intervention when needed.
- **Organ loss:** Removal of my right kidney, much of my bladder, part of my prostate, my belly button, my umbilical cord and numerous lymph nodes due to metastatic cancer.
- **Cardiac and respiratory conditions:** Transient Ischemic Attacks (TIAs), seizures that prevent me from being able to walk or drive, asthma, emphysema, and heart disease.
- **Autoimmune disorder:** In fall of 2017, I developed a rare autoimmune condition known as "resorption," which causes the body to attack its own bones and teeth,

leading to extensive facial damage, infections, and ongoing reconstructive surgeries. They tried to stop the process for 4 months it did not work. I had to have emergency surgery in January 2018, to prevent an aggressive and most often deadly form of meningitis. To this day I still need a prosthetic to hold my remaining teeth in place and face 3 more rounds of surgery to fix the damage and stabilize my teeth. My fear of Covid has stopped this process.

- **Skin damage:** After my surgery in 2002, I was wrongly prescribed Long-term of use of the second most powerful steroid topically applied called Elocon cream. This should have been used for a week which they wrongly had me apply topically for 10 years. This super potent steroid cream caused extreme steroid based rosacea, severe collagen degradation, resulting in extreme skin fragility, chronic sores, the inability to be in the sun, and peeling. I have an exemption in Vermont to have tinted front windows to prevent me from getting badly sunburned thru the glass.

4. **Mental Health**

- I suffer from extreme PTSD, severe OCD and chronic depression, exacerbated by the COVID-19 pandemic and the isolation it has imposed.
- To manage my conditions, I am prescribed 15 mg of Valium and up to 25 mg of Ambien daily. These medications only help me sleep for 3-4 hours, I am tired most days and require rest, and leave me cognitively impaired in the evenings, further limiting my functionality.

5. **Impact of COVID-19 Pandemic**

- As an immunocompromised individual with a history of cancer, heart disease and respiratory conditions, I live in constant fear of contracting COVID-19, RSV, or other infectious diseases which could be fatal for me.
- I avoid public spaces, limit store visits to early hours with full protective gear, I wipe all products coming into my home with Clorox wipes since covid began, avoid all crowds, leave my groceries if a line forms and have not eaten in a restaurant or been in any common social space since the pandemic began.
- The pandemic has isolated me entirely, leaving me without companionship, social interaction, or support. I live alone, relying solely on my TV, phone, and computer for connection. I run my business by phone and computer. I do all my meetings by zoom, other than meetings with my medical support teams.

6. Daily Limitations

- Due to skin fragility and pain, I cannot engage in basic activities like riding a bike, wearing a backpack, sitting for extended periods, taking hot showers, being in the sun, no steam rooms, no saunas, no strenuous exercise or wearing clothing with aggressive seams.
- I experience disorientation, particularly when driving or navigating unfamiliar areas, especially at night, requiring frequent stops and, on occasion, police assistance to regain orientation and having to stop at strange homes to seek assistance by guiding me with their vehicles to a highway I can recognize. I now always keep a full tank of gas, winter clothes, toilet paper and water in my truck just in case I get lost in the mountains where I live. Because of my PTSD and fear of getting sick, I often become confused in and crowd of people and have to leave immediately to regain my composure.
- Stress triggers my PTSD, my OCD, TIA'S, exacerbations of my rosacea and other health conditions, further impairing my ability to function.

7. Inability to Travel

- I have not traveled by airplane since 2017 due to health risks and physical limitations. I have not used any public transportation of any kind since Covid began.
- The fear of contracting an illness combined with physical and cognitive impairments without the support of my medical teams has rendered me unable to travel outside familiar areas.

8. Isolation and Emotional Toll

- The loss of my parents, estrangement from siblings, and the deaths of close friends during the pandemic have left me profoundly lonely.
- I often cry without reason, consumed by sadness and the absence of companionship.

9. Conclusion

- My health conditions, compounded by the ongoing pandemic, have created a life of isolation, fear, and physical suffering. I miss the world where I felt safe to leave my home and be with others. I am not well.

- o I struggle daily with basic tasks, depending on medications to cope, and face an uncertain future due to my compromised health necessitating endless medical appointments and tests to keep me alive.

I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 2/26/2025
[Date]

Signature: A. B. Goldman
Alan Bram Goldman